CSREES DISCUSSION DRAFT

Proposed Policy on Interim Performance Progress Reporting for Research Programs -- To Establish a Uniform Format for Federal Research Projects

The Executive Office of the President, Office of Science and Technology Policy (OSTP), and Office of Management and Budget (OMB), Office of Federal Financial Management (OFFM) have proposed issuing a policy to establish standard, government-wide categories for performance progress reporting on Federal grants and cooperative agreements awarded under research programs.

Each category is a separate reporting component. Recipients would be required to report on the mandatory category and may be required to report on any of the optional categories as instructed by the awarding agency. Agencies may develop an agency- or program-specific category, if necessary, to meet programmatic requirements. The proposed OSTP-OMB policy directive, however, instructs Federal agencies to minimize the degree to which they supplement the standard categories.

This proposal is an initiative of the Research Business Models (RBM) Subcommittee of the Committee on Science (CoS), a Committee of the National Science and Technology Council (NSTC), and is part of the implementation of the Federal Financial Assistance Management Improvement Act of 1999 (Public Law 106-107). Consistent with the purposes of that Act, the objective of this initiative is to establish a uniform format for reporting performance on Federal research projects. This proposed policy establishes a reporting format for progress reports only. The RBM Subcommittee will consider a format or formats for final reports after the progress report policy is issued. Agencies may use other OMB approved reporting formats for research centers/institutes, clinical trials, or fellowship/training awards.

SUPPLEMENTARY INFORMATION:

I. BACKGROUND

The Research Business Model Subcommittee objectives include:

- facilitating a coordinated effort across Federal agencies to address policy implications arising from the changing nature of scientific research; and
- examining the effects of these changes on business models for the conduct of scientific research sponsored by the Federal government.

The Subcommittee used public comments, agency perspectives, and input from a series of regional public meetings to identify priority areas on which it would focus its initial efforts. In each priority area, the Subcommittee is pursuing initiatives to promote, as appropriate, common policy, streamlining of current procedures, or the identification of agencies' and institutions' "best practices." As further information about the initiatives becomes available, it will be posted on the Subcommittee's web site at http://rbm.nih.gov.

The objective of one of the RBM Subcommittee's priority areas is greater uniformity in the form and content of performance reports that are required by Federal grants and

cooperative agreements awarded under research programs. This report format is intended for interim progress reports, not final reports (see Sec. IV. Invitation to Comment).   It is intended to address progress for the most recently completed period (at the frequency required by the sponsoring agency). Information once reported does not have to be provided again on subsequent reports.

Many Federal agencies have their own forms or formats that recipients must use to report progress on activities supported by research grants. While agencies use different formats and different language to request information on progress, they usually collect similar information. These variations increase the administrative effort and costs for recipients of Federal awards and make it difficult to compare research programs across the government. The Subcommittee believes more uniformity is possible. In addition, standard reporting categories will facilitate the development of a common electronic solution for collecting the information in lieu of collecting it through the numerous agency-unique reporting forms or systems currently used by Federal agencies.

The RBM Subcommittee reviewed the formats currently used by Federal agencies for reporting performance on research grants and decided to use the National Science Foundation's (NSF) reporting categories as a starting point for designing a standard format, because these categories have been used successfully by hundreds of NSF research programs. The proposed format does not change the performance reporting requirements in OMB Circulars A-102 and A-110; it merely provides additional clarification and instructions and a standard format for collecting the information.

II. PROPOSED REPORTING CATEGORIES

The OSTP and OFFM propose the following standard cover page data elements and mandatory and optional categories for performance progress reporting on grants and cooperative agreements awarded under research programs:

Cover Page Data Elements

- Federal Agency and Organization Element to Which Report is Submitted
- Federal Grant or Other Identifying Number Assigned by Agency
- Project Title
- Name of Submitter (PD/PI)
- DUNS and EIN Numbers
- Recipient Organization (Name and Address)
- Recipient Identifying Number or Account Number, if any
- Project/Grant Period (Start Date, End Date)
- Reporting Period End Date
- Report Term or Frequency (Annual, quarterly, semi-annual, other)
- Final Report (Yes/No)

MANDATORY REPORTING CATEGORY

Accomplishments: What was done? What was learned?
- What were the major goals and objectives of the activity?
- What was accomplished under these goals?
- What opportunities for training and development has the project provided?

- How have the results been disseminated to communities of interest?
- What do you plan to do during the next reporting period to accomplish the goals and objectives?

OPTIONAL REPORTING CATEGORIES

Changes/Problems/Special Reporting Requirements

- Changes in approach and reasons for change.
- Actual or anticipated problems or delays and actions or plans to resolve them.
- Changes that have a significant impact on the rate of expenditure.
- Significant changes in use or care of animals, human subjects, and/or biohazards.
- Special reporting requirements specified in award terms and conditions.

Products/Outcomes: What has the project produced?

- Publications, conference papers, and presentations
- Web site(s) or other Internet site(s)
- Networks and collaborations
- Technologies or techniques
- Inventions, patent applications, and/or licences
- Other products/outcomes

Participants: Who has been involved?

- What individuals have worked on the project?
- What other organizations have been involved as partners?
- Have other collaborators or contacts been involved?

Impact: What is the impact of the project? How has it contributed?

- To the development of the principal discipline(s) of the project?
- To other disciplines?
- To the development of human resources?
- To physical, institutional, and information resources that form infrastructure?
- To technology transfer?
- To society beyond science and technology?

Each category is a separate reporting component. Federal agencies would direct recipients to report on the mandatory category and could direct them to report on any of the optional categories, as appropriate. Agencies would use the standard instructions for each category but could add additional program-specific instructions if they needed to clarify a requirement for a particular program. For example, the Environmental Protection Agency (EPA) is required to collect information on environmental impacts; so EPA could direct recipients to report on the research's benefit to the environment or human health under the following reporting question: "How has the project contributed to society beyond science and technology?" Agencies could also develop additional agency- or program-specific reporting categories and instructions (e.g., the National Institutes of Health may need to collect information on clinical trials in certain types of awards); however, to maintain maximum uniformity, Section 4.b of the proposed policy

includes language that would instruct agencies to minimize the degree to which they supplemented the standard categories. Recipients would not be required or expected to report on each of the questions or items listed under a particular category. They would be advised to state "None" or "Nothing to report" if they had nothing significant to report.

IV. INVITATION TO COMMENT

During the now ended public comment period, suggested questions included:

- Are the categories and the elements appropriate?
- Are there other elements that should be included under the reporting categories?
- Should other categories be mandatory?
- Are the instructions easy to understand?
- Should agencies defer implementation until there is a common solution for collecting the information electronically? Should agencies use a downloadable fillable form or web form to report progress?
- The RBM Subcommittee may consider using this format for final reports as well as progress reports. Do you think the proposed format is appropriate for a final report? If so, should recipients be directed to provide summary information for the entire project period, or just for the last period? If not, what information should be included in a final report?

TO THE HEADS OF EXECUTIVE DEPARTMENTS AND ESTABLISHMENTS

SUBJECT: Standard Categories for Performance Progress Reporting on Research Grants and Cooperative Agreements

1. *Purpose.* This policy letter establishes standard, government-wide categories and instructions for performance progress reporting on grants and cooperative agreements awarded under research programs.

2. *Authority.* This policy letter is a part of the implementation of the Federal Financial Assistance Management Improvement Act of 1999 (Public Law 106-107).

3. *Background.* The Federal Financial Assistance Management Improvement Act required the Office of Management and Budget (OMB) to direct, coordinate, and assist Executive Branch departments and agencies in establishing an interagency process to streamline and simplify Federal financial assistance procedures for non-Federal entities.

   It also required each executive agency to develop, submit to the Congress, and implement a plan for the streamlining and simplification effort. Twenty-six agencies jointly submitted a plan to the Congress in May 2001. The plan described the interagency process and identified substantive areas in which the interagency groups had begun their review and simplification efforts. One of the areas addressed in the plan was the development of common reporting forms. The Research Business Models (RBM) Subcommittee, a Subcommittee of the National Science and Technology Council's Committee on Science, in coordination with the Public Law 106-107 Work Group, developed this standard, government-wide format for performance progress reporting on research grants and cooperative agreements. The proposed format does not change the performance reporting requirements in OMB

Circulars A-102 and A-110; it merely provides additional clarification and instructions and a standard format for collecting the information.

4. *Policy*

a. The attached cover page data elements and mandatory and optional reporting categories are the government-wide data elements and standard categories for performance progress reports for grants and cooperative agreements awarded under Federal research programs. If a research entity has reported information during one reporting period, it should not be required to report the same information in a subsequent period.

b. Agencies must direct recipients to report research progress using the mandatory category, unless a particular program has a program-unique performance report that has been approved by the Office of Information and Regulatory Affairs (OIRA), OMB, and may direct them to report on any of the optional categories.   However, in the interest of maximum uniformity, approval of a program-unique performance progress report will be permitted only in unusual circumstances.

c. Agencies must use the standard instructions that accompany each reporting category. They may add program-specific instructions in the award if needed to clarify the requirements for a particular program, but should limit such additions to the extent practicable. For example, the Environmental Protection Agency could direct recipients to report on the research's benefit to the environment or human health under the following reporting question: "How has the project contributed to society?"

d. Agencies may use other reporting formats for research centers/institutes, clinical trials, or fellowship/training awards. If an agency has an electronic reporting system that can identify the award and the recipient, it is not required to collect the standard institutional information included in the cover page data elements (see page 1 of the Attachment).

e. Agencies may supplement these reporting categories with an agency- or program-specific reporting category, if the supplemental category is approved by the OIRA as required by the Paperwork Reduction Act. Agencies are to minimize supplements, limiting them to that information that is required by statute or is necessary to meet programmatic requirements.

f. Agencies are encouraged to extend the use of these reporting categories to research contracts and intramural research projects, to the extent practicable.

5. *Responsibilities.*

Each Executive Branch department and agency must issue any needed direction to offices that award research grants and cooperative agreements to implement this policy.

Effective Date. The policy letter would be effective 30 days after issuance. All implementing actions other than regulatory revisions must be completed by the Executive departments and agencies, in coordination with the RBM Subcommittee, within 6 months of the effective date; any regulatory revisions must be completed within 18 months.